



*United States Attorney
Eastern District of New York*

F.#2012R02065

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Via ECF

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Re: United States v. Thomas Farese, et al.
Criminal Docket No. 12-94 (FB)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes the following discovery in the above-captioned case. Please also consider this letter to be the government's request for reciprocal discovery.

In or about and between April 2011 and December 2011, a cooperating witness ("CW-1"), who was a member of the Colombo crime family of La Cosa Nostra (the "Colombo family"), consensually recorded meetings and telephone conversations with one or more of the defendants and their associates.¹ The government may seek to introduce these recordings, in whole or in part, at trial during its case-in-chief. You may obtain these recordings through DupeCoop by contacting John Palermo at (973) 895-1359.

Because this letter discloses several consensual recordings made by a cooperating witness of individuals who are defendants in United States v. Andrew Russo, et al., 11 CR 30 (KAM), (the "Firewall Materials"), the government instituted firewall procedures. Pursuant to firewall procedures instituted in connection with the cooperating witness's proactive cooperation, the prosecutors and agents involved in the

¹ The information provided herein reflects the government's current understanding of which defendants are captured speaking during the consensually-recorded communications.

investigation and prosecution of the Russo case - including Assistant United States Attorneys Elizabeth Geddes and Allon Lifshitz - have not reviewed the Firewall Materials, nor have they been made aware of their contents. The Firewall Materials included in this Rule 16 disclosure are labeled: DX 278 - 36465, 36467, 36476, 36478, 36479, 36484, 36485, 36490, 36491, 36493, 36500, 36502, 36503, 36509, 36512, 36517, 36518, 36519, 36520, 36521, 36522, 36523, 36524, 36526, 36527, 36529, 36531, 36533, 36537, 36541, 36543, 36544, 36545, 36550, 36552, 36556, 36558, 36559, 36561, 36562, 36563, 36564, 36565, 36566, 36567, 36568, 36587, 36588, 36605, 36606, 36622, and 36623. Should you have any questions about any of the Firewall Materials, please contact Assistant United States Attorneys Jack Dennehy at (718) 254-6133, or Jacquelyn M. Kasulis at (718) 254-6103.

DESCRIPTION	DEFENDANTS INTERCEPTED	BATES RANGE
Consensual recording dated 4/18/11 (H1)		36464
Consensual recording dated 4/26/11 (H2)		36465
Consensual recording dated 4/28/11 (H3)		36466
Consensual recording dated 5/2/11 (H4)		36467
Consensual recording dated 5/3/11 (H5)		36468
Consensual recording dated 5/3/11 (H6A)		36469
Consensual recording dated 5/3/11 (H6B)	Farese	36470
Consensual recording dated 5/4/11 (H7A)		36471
Consensual recording dated 5/4/11 (H7B)		36472
Consensual recording dated 5/5/11 (H8)		36473
Consensual recording dated 5/10/11 (H9)		36474
Consensual recording dated 5/11/11 (H10)		36475
Consensual recording dated 5/12/11 (H11)		36476
Consensual recording dated 5/13/11 (H12)		36477
Consensual recording dated 5/13/11 (H13)		36478
Consensual recording dated 5/15/11 (H14)		36479
Consensual recording dated 5/17/11 (H15)		36480
Consensual recording dated 5/18/11 (H16)		36481

DESCRIPTION	DEFENDANTS INTERCEPTED	BATES RANGE
Consensual recording dated 5/18/11 (H17)		36482
Consensual recording dated 5/19/11 (H18)		36483
Consensual recording dated 5/20/11 (H19)		36484
Consensual recording dated 5/20/11 (H20)		36485
Consensual recording dated 5/24/11 (H21)		36486
Consensual recording dated 5/24/11 (H22)		36487
Consensual recording dated 5/26/11 (H23)		36488
Consensual recording dated 5/30/11 (H24)		36489
Consensual recording dated 5/31/11 (H25)		36490
Consensual recording dated 6/2/11 (H26)		36491
Consensual recording dated 6/2/11 (H27)		36492
Consensual recording dated 6/3/11 (H28)		36493
Consensual recording dated 6/8/11 (H29)	Truglia	36494
Consensual recording dated 6/9/11 (H30)		36495
Consensual recording dated 6/16/11 (H31)		36496
Consensual recording dated 6/17/11 (H32)		36497
Consensual recording dated 6/21/11 (H33)		36498
Consensual recording dated 6/23/11 (H34)		36499
Consensual recording dated 6/24/11 (H35)		36500
Consensual recording dated 6/29/11 (H36)		36501
Consensual recording dated 6/30/11 (H37)		36502
Consensual recording dated 7/8/11 (H38)		36503
Consensual recording dated 7/8/11 (H39)		36504
Consensual recording dated 7/12/11 (H40)		36505
Consensual recording dated 7/14/11 (H41)		36506
Consensual recording dated 7/15/11 (H42)		36507
Consensual recording dated 7/19/11 (H43)		36508

DESCRIPTION	DEFENDANTS INTERCEPTED	BATES RANGE
Consensual recording dated 7/22/11 (H44)		36509
Consensual recording dated 7/29/11 (H45)		36510
Consensual recording dated 8/2/11 (H46)		36511
Consensual recording dated 8/5/11 (H47)		36512
Consensual recording dated 8/10/11 (H48)		36513
Consensual recording dated 8/12/11 (H49)		36514
Consensual recording dated 8/15/11 (H50)		36515
Consensual recording dated 8/17/11 (H51)		36516
Consensual recording dated 8/19/11 (H52)		36517
Consensual recording dated 8/24/11 (H53)		36518
Consensual recording dated 8/26/11 (H54)		36519
Consensual recording dated 8/31/11 (H55)		36520
Consensual recording dated 9/2/11 (H56)		36521
Consensual recording dated 9/8/11 (H57)		36522
Consensual recording dated 9/9/11 (H58)		36523
Consensual recording dated 9/14/11 (H59)		36524
Consensual recording dated 9/16/11 (H60)		36525
Consensual recording dated 9/21/11 (H61)		36526
Consensual recording dated 9/23/11 (H62)		36527
Consensual recording dated 9/28/11 (H63)		36528
Consensual recording dated 9/30/11 (H64)		36529
Consensual recording dated 10/4/11 (H65)		36530
Consensual recording dated 10/7/11 (H66)		36531
Consensual recording dated 10/13/11 (H67)		36532
Consensual recording dated 10/14/11 (H68)		36533
Consensual recording dated 10/19/11 (H69)		36534
Consensual recording dated 10/21/11 (H70)		36535

DESCRIPTION	DEFENDANTS INTERCEPTED	BATES RANGE
Consensual recording dated 10/24/11 (H71)		36536
Consensual recording dated 10/26/11 (H72)		36537
Consensual recording dated 10/28/11 (H73)		36538
Consensual recording dated 11/3/11 (H74)		36539
Consensual recording dated 11/4/11 (H75)		36540
Consensual recording dated 11/9/11 (H76)		36541
Consensual recording dated 11/10/11 (H77)		36542
Consensual recording dated 11/11/11 (H78)		36543
Consensual recording dated 11/14/11 (H79)	Farese	36544
Consensual recording dated 11/15/11 (H80)	Truglia	36545
Consensual recording dated 11/16-17/11 (H81)	Farese and Truglia	36546
Consensual recording dated 11/18/11 (H82)		36547
Consensual recording dated 11/23/11 (H83A)		36548
Consensual recording dated 11/23/11 (H83B)		36549
Consensual recording dated 11/25/11 (H84)		36550
Consensual recording dated 11/30/11 (H85)		36551
Consensual recording dated 12/1/11 (H86)		36552
Consensual recording dated 12/5/11 (H87)		36553
Consensual recording dated 12/6/11 (H88)		36554
Consensual recording dated 12/7/11 (H89)		36555
Consensual recording dated 12/7/11 (H90)		36556
Consensual recording dated 12/8/11 (H91)		36557
Consensual recording dated 12/11/11 (H93A)	Truglia	36558
Consensual recording dated 12/11/11 (H93B)		36559

DESCRIPTION	DEFENDANTS INTERCEPTED	BATES RANGE
Consensual recording dated 12/11/11 (H93C)	Farese and Truglia	36560
Consensual recording dated 12/13/11 (H94)		36561

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<u>DESCRIPTION</u>	<u>BATES RANGE</u>
Consensual telephone calls placed by or made to Joseph Carna at (718) 948-9380 between April and June 2011	36562
Consensual telephone calls placed by or made to Joseph Carna at (718) 494-8511 between May 2011 and September 2011	36563
Consensual telephone calls placed by or made to Joseph Carna at (718) 219-7894 between May 2011 and November 2011	36564
Consensual telephone calls placed by or made to Joseph Carna at (347) 753-6380 between July 2011 and December 2011	36565
Consensual telephone calls placed by or made to Joseph Carna at (718) 948-9628 in September 2011	36566
Consensual telephone calls placed by or made to Joseph Carna at (718) 980-3398 in September 2011	36567
Consensual telephone calls placed by or made to John Maggio at (646) 509-6255 between May 2011 and June 2011	36568
Application and Order Authorizing the Interception of Communications Occurring Over a Cellular Telephone Assigned Telephone Number (347) 804-2816, and Mobile Equipment Identifier ("MEID") A00000248BEC2B, and a Cellular Telephone Assigned Telephone Number (954)459-5083, and MEID A0000029212991, dated April 7, 2011	36569-36586
Consensual telephone calls placed by or made to (347) 804-2816 between April 7, 2011 and July 12, 2011	36587

<u>DESCRIPTION</u>	<u>BATES RANGE</u>
Consensual telephone calls placed by or made to (954) 459-5083 between April 7, 2011 and July 12, 2011	36588
Application and Order Authorizing the Interception of Communications Occurring Over a Cellular Telephone Assigned Telephone Number (347) 804-2816, and Mobile Equipment Identifier ("MEID") A00000248BEC2B, and a Cellular Telephone Assigned Telephone Number (954)459-5083, and MEID A0000029212991, dated July 7, 2011	36589-36604
Consensual telephone calls placed by or made to (347) 804-2816 between July 12, 2011 and October 5, 2011	36605
Consensual telephone calls placed by or made to (954) 459-5083 between July 12, 2011 and October 5, 2011	36606
Application and Order Authorizing the Interception of Communications Occurring Over a Cellular Telephone Assigned Telephone Number (347) 804-2816, and Mobile Equipment Identifier ("MEID") A00000248BEC2B, and a Cellular Telephone Assigned Telephone Number (954)459-5083, and MEID A0000029212991, dated October 5, 2011	36607-36621
Consensual telephone calls placed by or made to (347) 804-2816 between October 5, 2011 and December 15, 2011	36622
Consensual telephone calls placed by or made to (954) 459-5083 between October 5, 2011 and December 15, 2011	36623

